

US EPA ARCHIVE DOCUMENT

PPDC Pollinator Protection Plan Metrics WG - Meeting Minutes

7/27/2017

Attendees:

(in person) Mike Goodis, Lead, Meredith Laws, Tom Steeger, Dee Colby
(call-in) Stephanie Binns (for Aaron Hobbs), Ray Brinkmeyer, Michele Colopy, Richard Crespin, Rose Kachadoorian, Jeanette Klopchin, Caydee Savinelli, Al Summers, Tom Van Arsdall, Liza Fleeson Trossbach
(invited guest)

Agenda (attached)

Welcome, Introductions, Agenda Review – Mike/Dee

Workgroup members and invited participants introduced themselves.

Review of Meeting Minutes from June 22, 2017 - Dee

Meeting minutes were read but perhaps not finalized from the June 22 meeting and will be brought up again during the August 10 meeting for finalization before being posted on the PPDC website.

Al Summers: expressed concern regarding other issues facing beekeepers such as the difficulty in obtaining prescriptions for terramycin to control/treat American Foul Brood (ABF). EPA responded that while antibiotic use to control ABF is not under EPA jurisdiction (*i.e.*, FDA regulates this use), EPA has relayed these concerns to the USDA Office of Pest Management Policy.

Feedback from SFIREG – Rose Kachadoorian

Meeting notes from the Workgroup/SFIREG meeting are included in the July 27, 2017 meeting agenda (attached).

Rose Kachadoorian, Workgroup member representing the Oregon Department of Agriculture, gave a presentation, along with Liza Fleeson Trossbach from the Virginia Department of Agriculture and Consumer Services, on the challenges that SFIREG/AAPCO encountered when preparing guidance for states to develop MP3s. See Challenges – Evaluating Effectiveness PowerPoint presentation. Points brought up during the presentation included:

- 1) Ideally, EPA should have indicated what they considered success. The Workgroup is only measuring output and not outcome.
- 2) The metric should allow states to pick and choose the elements that show their plans' successes...referred to as a "pick-list".
- 3) Options for the "pick-list" should come from the SFIREG document, which includes the following 5 categories: behavioral changes, reducing exposure of bees to pesticides, compliance, and national improvement in pollinator health.
- 4) Allow each state to report success as they see fit. For example, some states may have honey production in their plan, so then they could report honey production. This would permit states to use the plans that they have developed and not impose categories in a metric that doesn't pertain to their plan.
- 5) States should be permitted the option to include a qualitative narrative of their plan's success. Some elements may lend themselves to a quantitative assessment; however, a qualitative response would provide greater flexibility for states to respond and report success of their plans.
- 6) Perhaps the Workgroup could figure out a mechanism to relay state measurable outcomes, which are suggested in the SFIREG document, to the EPA.

Comments from the Workgroup included:

- 1) Workgroup representatives were not familiar with the "pick-list" concept; however, the idea could potentially be incorporated into the proposed metrics. Workgroup members believed that the two measures are similar in approach, but worded differently.
- 2) EPA - States were encouraged to develop plans based on the needs of their state; therefore, EPA realized the plans would be variable. So how should the EPA now look at the plans with a national-level perspective to determine if collectively the plans are contributing to pollinator health, and how should the EPA communicate that information to the public? Looking at each individual state plan is not useful; how would the information (*i.e.*, data) coming from the states be normalized?
- 3) The Workgroup's focus encompasses what all states are doing with respect to MP3s and has attempted to identify areas of commonality across MP3s. The proposed metric is to measure what states are doing, not to change the plans, but to determine the success of the activities of each plan (whether specified objectives are being met). In this respect, each state will be different. The Workgroup is therefore trying to determine how best to measure common themes of plans, such as, change in behavior, action, *etc.*
- 4) Outcomes are a chain of results, which for our purposes, would potentially lead to improvements in honey bee health. So, it would be useful to measure interim efforts until states could get to measuring the outcomes.

Discussion: Next Steps – Caydee Savinelli

As the Workgroup moves forward, maybe we could look at the "pick-list" concept and revisit the SFIREG document and come up with a Strawman document of what may be doable.

Rose/Liza – In the SFIREG document, refer to specific objectives of what the metric measures. The Workgroup metric should define the overarching goal and the ways to address that goal.

The idea of using existing data was revisited by Workgroup members, this time from the standpoint of having the Workgroup perform a meta-analysis of the data from Bee Informed Partnership or other source and approach the Workgroup's goal from a meta-analysis of what is already reported rather than a new metric. That way, even if causality can't be established, the analyses could at least show trends. However, the data would need to be related to each state's individualized MP3 and that is not reasonable for the scope of this Workgroup. The Workgroup is trying to demonstrate causation/correlation and existing data would have disparity between states.

Again, the question was asked as to the best route forward for the group given that at this point the Workgroup seems to be circling back. Therefore, it was suggested to re-examine the proposed metric and the "pick-list" process. Also, the sentiment was that it would be useful to bring the Workgroup and SFIREG back together again in the future for further feedback.

Rose/Liza – Look at the final guidance document from SFIREG (see link below) to the states for the purpose of MP3 development and identifying critical components. Critical components included communication between stakeholders and reducing pesticide exposure. The overall intent of the feedback from SFIREG was not to derail the progress of the Workgroup; States went to a lot of effort to develop MP3s and want to be supportive of the EPA.

State FIFRA Issues, Research, and Evaluation Group Final Guidance for State Lead Agencies for the Development and Implementation of Managed Pollinator Protection Plans, June 2015.

<https://aapco.files.wordpress.com/2015/08/sfireg-mp3-guidance-final.pdf>

Meeting Recap – Dee

It was suggested to have the August meeting sooner in the month than later since so many of the Workgroup members were unable to attend and/or get on the call due to technical difficulties with the conference line. The August meeting should focus on the direction that the Workgroup intends to proceed with the proposed metric.

PPDC Pollinator Protection Plans Metrics Workgroup

Call-In Meeting 7/27/2017 2:00 – 3:30 pm

1-866-299-3188; 703-347-8657

Adobe connect:

<http://epawebconferencing.acms.com/r5g0xx2cwzf/>

The objective of this meeting is to discuss the feedback that SFIREG provided to the Workgroup about the proposed metric during the June 27, 2017 and to deliberate on how best to proceed with the proposed metric.

Agenda:

Welcome, Introductions, Ground Rules, Agenda Review – Mike/Dee (10 min)

Workgroup members and participants will introduce themselves.

Review of Meeting Minutes from June 22, 2017 - Dee (5 min)

Finalize meeting minutes from the June meeting.

Feedback from SFIREG – Rose Kachadoorian (30 min)

Attached are meeting notes from the PPDC Workgroup/SFIREG meeting on June 27, 2017. Rose will lead the discussion. Invited guest, Liza Fleeson Trossbach (VA), who was in attendance at the full PPDC meeting in May and the joint Workgroup/SFIFREG meeting in June, will join in the discussion with the Workgroup. Others from the Workgroup that were participants of the meeting are encouraged to provide additional comments from the meeting that may not have been captured in the notes.

Discussion: Next Steps – Caydee Savinelli (30 min)

Based on the feedback from the full PPDC in May and SFIREG in June, what should the next steps be towards reaching our goal in the development of our proposed metric?

Wrap Up – Mike (10 min)

Meeting Recap – Dee (5 min)

Next meeting...tentative date August 24, 2017 at 2:00-3:30 p.m. EST

PPDC Pollinator Protection Plans Metrics Workgroup Meeting with SFIREG - Meeting Notes 6/27/2017

Participants for PPDC Metric Workgroup: Stephanie Binns (RISE), Ray Brinkmeyer (DOW AgroSciences), David Epstein (USDA ARS), Jim Fredericks (NPMA), Dudley Hoskins (NASDA), Rose Kachadoorian (Oregon Dept. of Ag.), Don Parker (National Cotton Council), Caydee Savinelli (Syngenta), Tom Van Arsdall (Pollinator Partnership), Meredith Laws (EPA), Tom Steeger (EPA), Dee Colby (EPA)

SFIREG Participants: George Farnsworth (CA), Jeff Comstock (VT), Hank Uhden (WY), Jeffrey Rogers (VA), Linda Alfakir (EPA), Mary Begin (D.C.), Michelle Bogner (MI), Jessica Pruett (MI), Davis Daiker (FL), Tim Drake (Clemson Univ), Kima Caddell (MT), Erica Millette (NM), Sarah Caffery (IN), Stephanie Tougas (EPA), Cory Cooley (OR), Tony Cofer (AL), Liza Fleeson Trossbach (VA), Christopher Wade (DE), Judy Glass (KS), Ed White (IN), Ryan Williams (OK), Patrick Jones (NC), Taryn Lascola (MA), Amy Bamber (AAPCO/SFIREG), Anthony Lamanno (NY), Yvette Hopkins (EPA FEAD), Lance Wormell (EPA FEAD), Emily Ryan (EPA FEAD), Cary Giguere (VT), Fred Corey (TPPC), Kerry Richards (AAPSE)

Welcome and Introductions – Meredith Laws

Participants from the PPDC Pollinator Protection Plans Metrics Workgroup and SFIREG introduced themselves. Note: Although the SFIREG agenda identified the meeting as a closed door discussion between co-regulators, the meeting was between SFIREG members and members of the PPDC Pollinator Protection Plans Metrics Workgroup, who are not regulators.

Presentation from the PPDC Metrics Workgroup – Caydee Savinelli and Don Parker

See attached for the presentation, included were:

- Metrics Workgroup Objectives**
- Process**
- Definition of Plans**
- MP3 Review**
- National-Level Metrics Guidance**
- Implementation**
- Next Steps**

Discussion and feedback from SFIREG – Meredith Laws (Lead for PPDC Workgroup) and Cary Giguere (VT/Lead for SFIREG)

There was a request that the presentation be sent out to those in attendance. Comments from participants included:

SFIREG - What is the interval for [state] self-assessment, *i.e.*, is it an annual assessment?

Workgroup – That is not known yet; however, there is a need for some entity to oversee metric effort; no decision has been made as to whether this would be state self-assessment.

Workgroup – What interval do the states think is appropriate? (No response given)

SFIREG – These are ways to measure effort. The proposed metric measures outputs (*i.e.* effort). Trying to measure outcomes (*i.e.*, effect) is different from what the workgroup has proposed. Maybe the workgroup

needs to add additional columns. For example, column 2 might be the way in which a state went about getting to various outcomes; column 3 would be the outcomes that the states are achieving.

SFIREG – Who charged the EPA to develop metrics?

Workgroup – to avoid further mitigation (*e.g.*, label restrictions) we need to show state plans are working.

SFIREG – Were the metrics previously developed by SFIREG inadequate?

Workgroup – How does the SFIREG metric get back to EPA?

SFIREG – None of the guidance provided to states on developing plans defined “success” especially with respect to national-level measures; plans do not define success; and EPA did not respond to previous inquiries by states as to what constitutes success. Some plans are just getting started and to realize success of a plan may take many years. States don’t want comparisons. Why not have states report their success then look for commonalities? The proposed metric process will result in flawed data.

Workgroup – We are trying to account for diversity in managed pollinator protection plans (MP3s) by allowing flexibility in how metrics are applied.

SFIREG – The number is meaningless...does that show success?

SFIREG – These are metrics assigned to various efforts (*e.g.*, outreach, education, *etc.*).

Workgroup – The White House’s *National Strategy to Promote the Health of Honey Bees and Other Pollinators* is still in effect: 1) encourages states to develop plans; 2) label language was developed to reduce acute exposure of bees to pesticides; 3) a SFIREG/AAPCO guidance document was drafted; 4) and MP3s were to be used as a means of further reducing exposure of bees to pesticides as well as potentially reducing the effect of other factors associated with pollinator declines. This was all done as a collaborative effort. There is concern that states need assistance to implement plans before we even get to this point of a measurement of success. Bottom line...the plans require funding.

SFIREG – What is EPA’s vision for the plans long term? (No response given)

SFIREG – It takes money to implement plans. We are having problems just keeping mandatory programs going, so voluntary programs get left out. It costs money to do education and for travel to meetings, *etc.*

Workgroup – We want to be able to say that EPA supports states plans and that states are doing due diligence to inform, improve communication, increase awareness, *etc.* This information obtained from evaluating the plans would help us to inform the public.

SFIREG – Plans are very, very different. Inevitably numbers lead to comparisons. Effort will vary from year to year due to funding. How we target success/outcomes varies too. Relationships with stakeholders vary by state and even year to year within a state.

Workgroup – It is our understanding that the EPA’s ultimate goal is to see a reduction in possible pesticide exposure. The proposed assessment is focused on activities to correlate to reduced exposure.

SFIREG – 1) List the outcomes that MP3s are trying to achieve, 2) identify what can be measured, 3) associate the measure to the outcome, and then this will provide the correlation of “this much effort” was put into “this outcome”.

SFIREG – Get an expert in evaluations to help with linking between effort and outcome.

Workgroup – Behavioral changes are what we want to measure as outcome. The Workgroup has been working with experts who measure behavioral change, both within the Workgroup and invited experts in the field.

Workgroup – States need a baseline. Since there is variability across states, how do we look at a level playing field when we are looking at how well the plans are doing on a national level without creating an additional burden for the states?

SFIREG – Specific metrics would relate to a specific goal. Look at the link provided by SFIREG to see how plan specifics would relate to measures.

SFIREG – We worked previously with a man who measures environmental change...who informed us of the difference between measuring effort vs. outcomes. States would like to see measures of success and not what states could afford to do in a particular year.

Workgroup – Effort is useful information to the Agency.

SFIREG – All 5 goals that were developed by SFIREG were meant to inform the EPA of states' success.

Workgroup – SFIREG goals are for long-term; the proposed metrics let the Agency see what is taking place in the interim (*i.e.*, short term).

Workgroup – There is no funding for a national measure of success, so how should the EPA get and ask for information when there is no funding input and in a way that would not burden the states?

Workgroup – Other groups such as, The Pollinator Partnership, struggle with this as well. Some of those groups measure outcomes. We could ask the states if they are measuring outcomes. If we show enough value where a need is met, then maybe resources would be appropriated. The proposed metric is a means to an end, if not, then why make the effort. MP3s are a tool. If stakeholders don't find that MP3s are useful, then the tool is not working...and also which parts of the MP3s are of most value.

SFIREG – Are states measuring success?

Workgroup – Some states are starting to...for example MS.

SFIREG – Acknowledge that the proposed metrics are measuring effort or decide to link effort with an outcome.

SFIREG – The proposed metrics need to show a correlation. What does the metric relate to? This is the missing piece. Show states what will help the EPA.

Workgroup – Maybe states can listen-in during Workgroup meetings.